

Exhibit A

THE LAW OFFICE OF JOSEPH MAURO, LLC
631 MONTAUK HIGHWAY STE. 6
WEST ISLIP, NY 11795

(631) 669-0921
(631) 669-5071 fax

August 22, 2007

David J. Gold, Esq.
116 John St.
New York, NY 10038

RE: Krapf v. Professional Collection Services, Inc. et al
CV - 07-1520

VIA MAIL & FAX 212-962-2919

Mr. Gold,

I am forwarding herewith (via fax and mail) Plaintiff's Request for Admissions; Interrogatories; and Request for Documents with respect to all Defendants.

I respectfully request that you respond to discovery within the statutory guidelines. Additionally, please note that in the event that the requests for admission are not answered within the statutory period, Plaintiff does intend to rely on such.

Additionally, I am forwarding herewith (via fax and mail) the Notices of Deposition for Professional Collection Services, Inc., James Dorsa, and James Vogel. Please note that these are "real dates"; that is, Plaintiff intends on taking the depositions on the noticed dates.

Sincerely,



Joseph Mauro

Exhibit B

THE LAW OFFICE OF JOSEPH MAURO, LLC

631 MONTAUK HIGHWAY STE. 6

WEST ISLIP, NY 11795

(631) 669-0921

(631) 669-5071 fax

September 20, 2007

David J. Gold, Esq.

116 John St.

New York, NY 10038

RE: Krapf v. Professional Collection Services, Inc. et al

CV – 07-1520

VIA MAIL & FAX 212-962-2919

Mr. Gold,

I am writing to remind you to please immediately forward the Defendants' discovery responses in the above referenced matter. Plaintiff served Request for Admissions; Interrogatories; and Request for Documents with respect to all Defendants. I have yet to receive any response.

I respectfully request that you respond to discovery within the statutory guidelines. Additionally, please note that in the event that the requests for admission are not answered within the statutory period, Plaintiff does intend to rely on such.

In addition, I want to confirm that Plaintiff intends to begin the depositions of Defendants on October 10, 2007 at 10:00am as noticed.

Sincerely,

Joseph Mauro

Exhibit C

THE LAW OFFICE OF JOSEPH MAURO, LLC

(631) 669-0921

631 MONTAUK HIGHWAY STE. 6

(631) 669-5071 fax

WEST ISLIP, NY 11795

October 1, 2007

David J. Gold, Esq.

116 John St.

New York, NY 10038

Via Mail and Fax (212) 962 2919

RE: Krapf v. Professional Collection Services, Inc. et al
CV - 07-1520

Mr. Gold,

I am writing to confirm that notwithstanding our prior discussions, and my numerous requests, Defendants did not provide any response to the Plaintiff's interrogatories. Nor did the Defendant provide any response to the Plaintiff's requests for documents. As such, please note that any objection to any of the requests has been waived.

I again respectfully request that Defendant immediately provide responses to this propounded discovery. Please note that I served such requests on August 22, 2007. In the event that Defendant has not provided such documents on or before October 4, 2007, Plaintiff intends to ask the Court to compel such.

Lastly, please let this letter again confirm the deposition of James Vogel on October 10, 2007 at 10:00am.

Sincerely,



Joseph Mauro

Exhibit D

LAW OFFICES OF
DAVID J. GOLD, P.C.
116 JOHN STREET
SUITE 3110
NEW YORK, NEW YORK 10038-3411

TEL.: 212.962.2910
FAX: 212.962.2919
EMAIL: DJGPCESQ1@AOL.COM

VIA FACSIMILE ONLY: 631.669.5071

Tuesday, October 09, 2007

THE LAW OFFICE OF JOSEPH MAURO, LLC
631 Montauk Highway, Suite 6
West Islip, New York 11795

ATT: JOSEPH MAURO, ESQ.

RE: PROFESSIONAL COLLECTION SERVICES, INC., et al. adv. AUDREY KRAPP
DJGPC File No.: 1339477
Case No.: CV 07-1520 (LDW)

Dear Mr. Mauro:

This will acknowledge receipt of your recent motion to the Court,
in connection with the above-entitled matter.

In light of same, we shall have the Court fix a date for
depositions of all parties.

Please note that I should have my clients' discovery responses to
you shortly.

Finally, my clients have indicated a willingness to resolve this
matter. Kindly advise as to a settlement demand so that I can
discuss same with my clients. Thank you.

Very truly yours,

DAVID J. GOLD

DJG/ljs

Exhibit E

THE LAW OFFICE OF JOSEPH MAURO, LLC

631 MONTAUK HIGHWAY STE. 6
WEST ISLIP, NY 11795

(631) 669-0921

(631) 669-5071 fax

October 9, 2007

David J. Gold, Esq.
116 John St.
New York, NY 10038

Via Fax (212) 962 2919

RE: Krapf v. Professional Collection Services, Inc. et al
CV - 07-1520

Mr. Gold,

Please be advised that pursuant to Federal Rule 30, the deposition of Defendant will go forward tomorrow as noticed. I have informed you numerous times that the deposition was to go forward, and you never objected in any manner. Instead the day before the deposition, you faxed me a document telling me that you want the court to pick deposition dates. Your letter seems to indicate that because you failed to provide me any documents, your client does not have to appear for a deposition. While I am generally amenable to changing deposition dates to accommodate conflicting schedules and the like, I can not agree to your request under these circumstances. As such, I intend to begin the deposition of defendant tomorrow.

Sincerely,



Joseph Mauro

Exhibit F

THE LAW OFFICE OF JOSEPH MAURO, LLC
631 MONTAUK HIGHWAY STE. 6
WEST ISLIP, NY 11795

(631) 669-0921
(631) 669-5071 fax

October 9, 2007

David J. Gold, Esq.
116 John St.
New York, NY 10038

Via Fax (212) 962 2919

RE: Krapf v. Professional Collection Services, Inc. et al
CV - 07-1520

OCT 09 2007

Mr. Gold,

Please be advised that pursuant to Federal Rule 30, the deposition of Defendant will go forward tomorrow as noticed. I have informed you numerous times that the deposition was to go forward, and you never objected in any manner. Instead the day before the deposition, you faxed me a document telling me that you want the court to pick deposition dates. Your letter seems to indicate that because you failed to provide me any documents, your client does not have to appear for a deposition. While I am generally amenable to changing deposition dates to accommodate conflicting schedules and the like, I can not agree to your request under these circumstances. As such, I intend to begin the deposition of defendant tomorrow.

Sincerely,

Joseph Mauro

10/9/07 - Grow up! Get a life!

Exhibit G

Statement

Page 1

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK
4 AUDREY KRAPP,)
5 Plaintiff,)
6 vs.) No. 07-1520
7 PROFESSIONAL COLLECTION)
8 SERVICES, INC., JAMES VOGEL,)
9 JAMES DORSA "JIMMY KING")
10 and CHARLES J. O'SHEA)
11 FUNERAL HOME,)
12 Defendants.)
13 -----)

ORIGINAL

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16 STATEMENT ON THE RECORD
17 Garden City, New York
18 Wednesday, October 10, 2007
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23 Reported by:
24 ANGELA BITJONIDES
25 JOB NO. 197939

Statement

Page 2

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October 10, 2007

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10:35 a.m.

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Statement on the Record taken at the offices
of Esquire Deposition Services, 1225 Franklin
Avenue, Suite 325, Garden City, New York,
before Angela Bitjonides, a Notary Public
of the State of New York.

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Statement

Page 4

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MR. MAURO: Good morning

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My name is Joseph Mauro, and I'm the attorney for the plaintiff, Audrey Krapf, in the matter of "Audrey Krapf against Professional Collection Services, Inc., James Vogel, James Dorsa "Jimmy King" and Charles J. O'Shea Funeral Home." In the United States District Court in the Eastern District of New York. Under Docket number 07-1520

I am at Esquire Deposition Services located at 1225 Franklin Avenue, Suite 325, Garden City, New York.

I am here for the deposition of defendant, James Vogel. The deposition was noticed for 10:00 a.m. this morning, October 10, 2007. The deposition was scheduled to occur at 10:00 a.m. The Deposition Notice was served upon defense counsel on August 22, 2007.

There has been no appearance by defense counsel, Mr. David Gold; nor, the defendant, James Vogel. It is currently 10:36 a.m.

I have called the office of Attorney David Gold and I have spoken with his receptionist. The receptionist was unable to

Statement

Page 5

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tell me whether Mr. Gold would be appearing

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this morning. I asked the receptionist to

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please call me back at my mobile cell phone

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number and I have not received a telephone call

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back.

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(Time noted: 10:41 a.m.)

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Statement

Page 6

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C E R T I F I C A T E

3 STATE OF NEW YORK)

4) ss.:

5 COUNTY OF NASSAU)

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I, ANGELA BITJONIDES, a

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Stenotype Reporter and Notary Public

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in and for the State of New York, do

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hereby certify that the foregoing is a

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true and accurate transcript of the

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within proceeding.

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I further certify that I am not

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related to any of the parties to this

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action by blood or marriage, and that

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I am in no way interested in the

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outcome of this matter.

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IN WITNESS WHEREOF, I have

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hereunto set my hand this 11th day

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of October, 2007.

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23

Angela Bitjonides

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Statement

Page 7

<p>A</p> <p>accurate 6:11 action 6:15 Angela 1:24 2:12 6:7,23 appearance 3:15 4:20 appearing 5:2 asked 5:3 attorney 3:5,12 4:4 4:23 Audrey 1:4 4:4,5 August 4:19 Avenue 2:11 4:12 a.m 2:7 4:16,18,22 5:7</p> <p>B</p> <p>back 5:4,6 Bitjonides 1:24 2:12 6:7,23 blood 6:15</p> <p>C</p> <p>C 3:2 6:2,2 call 5:4,5 called 4:23 cell 5:4 certify 6:10,13 Charles 1:10 4:7 City 1:17 2:11 4:13 Collection 1:7 4:6 counsel 4:19,21 COUNTY 6:5 Court 1:2 4:9 currently 4:22</p> <p>D</p> <p>David 3:11 4:21,24 day 6:19 defendant 4:15,21 Defendants 1:12 3:12 defense 4:19,20 deposition 2:10 4:11 4:14,15,17,18 District 1:2,3 4:9,9 Docket 4:10 Dorsa 1:9 4:7</p> <p>E</p> <p>E 3:2,2 6:2,2 Eastern 1:3 4:9 ESQ 3:8,11 Esquire 2:10 4:11</p>	<p>F</p> <p>F 6:2 foregoing 6:10 Franklin 2:10 4:12 Funeral 1:11 4:8 further 6:13</p> <p>G</p> <p>Garden 1:17 2:11 4:13 Gold 3:11 4:21,24 5:2 Good 4:2</p> <p>H</p> <p>hand 6:19 hereunto 6:19 Highway 3:6 Home 1:11 4:8</p> <p>I</p> <p>interested 6:16 Islip 3:7</p> <p>J</p> <p>J 1:10 3:11 4:7 James 1:8,9 4:6,7,15 4:22 Jimmy 1:9 4:7 JOB 1:25 John 3:13 Joseph 3:4,8 4:3</p> <p>K</p> <p>King 1:9 4:7 Krapf 1:4 4:4,5</p> <p>L</p> <p>LAW 3:4 located 4:12</p> <p>M</p> <p>marriage 6:15 matter 4:5 6:17 Mauro 3:4,8 4:2,3 mobile 5:4 Montauk 3:6 morning 4:2,16 5:3</p> <p>N</p> <p>N 3:2 name 4:3 NASSAU 6:5 New 1:3,17 2:11,13 3:7,14,14 4:10,13</p>	<p>6:3,9 Notary 2:12 6:8 noted 5:7 Notice 4:18 noticed 4:16 number 4:10 5:5</p> <p>O</p> <p>occur 4:18 October 1:18 2:6 4:16 6:20 office 3:4 4:23 offices 2:9 outcome 6:17 O'Shea 1:10 4:8</p> <p>P</p> <p>P 3:2,2 parties 6:14 phone 5:4 plaintiff 1:5 3:5 4:4 please 5:4 proceeding 6:12 Professional 1:7 4:6 Public 2:12 6:8</p> <p>R</p> <p>R 3:2 6:2 received 5:5 receptionist 4:25,25 5:3 Record 1:16 2:9 related 6:14 Reported 1:23 Reporter 6:8</p> <p>S</p> <p>S 3:2 scheduled 4:17 served 4:19 Services 1:8 2:10 4:6,11 set 6:19 spoken 4:24 ss 6:4 State 2:13 6:3,9 Statement 1:16 2:9 States 1:2 4:8 Stenotype 6:8 Street 3:13 Suite 2:11 4:12</p> <p>T</p> <p>T 6:2,2 taken 2:9 telephone 5:5</p>	<p>tell 5:2 Time 5:7 transcript 6:11 true 6:11</p> <p>U</p> <p>unable 4:25 United 1:2 4:8</p> <p>V</p> <p>Vogel 1:8 4:7,15,22 vs 1:6</p> <p>W</p> <p>way 6:16 Wednesday 1:18 West 3:7 WHEREOF 6:18 WITNESS 6:18</p> <p>Y</p> <p>York 1:3,17 2:11,13 3:7,14,14 4:10,13 6:3,9</p> <p>0</p> <p>07-1520 1:6 4:10</p> <p>1</p> <p>10 1:18 2:6 4:17 10:00 4:16,18 10:35 2:7 10:36 4:22 10:41 5:7 10038 3:14 11th 6:19 116 3:13 11795 3:7 1225 2:10 4:12 197939 1:25</p> <p>2</p> <p>2007 1:18 2:6 4:17 4:19 6:20 22 4:19</p> <p>3</p> <p>325 2:11 4:12</p> <p>6</p> <p>631 3:6</p>	
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